

Fill in this information to identify the case:

United States Bankruptcy Court for the:

Southern District of Texas
(State)

Case number (if known): Chapter 11

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

04/20

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Gavilan Resources, LLC

2. All other names debtor used in the last 8 years BCP Dawn Holdings, LLC
Aguila Production, LLC

Include any assumed names, trade names, and *doing business as* names

3. Debtor's federal Employer Identification Number (EIN) 81-3366688

4. Debtor's address	Principal place of business	Mailing address, if different from principal place of business
	920 Memorial City Way Number Street	Number Street
	Suite 1400	P.O. Box
	Houston TX 77024 City State ZIP Code	City State ZIP Code
	Harris County	Location of principal assets, if different from principal place of business
		Number Street
		City State ZIP Code

5. Debtor's website (URL) https://www.gavilanresources.com

6. Type of debtor

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

☐ Partnership (excluding LLP)

☐ Other. Specify: _____

Debtor

Gavilan Resources, LLC

Case number (if known)

Name

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the above

B. Check all that apply:

- ☐ Tax- exempt entity (as described in 26 U.S.C. § 501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

2111

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9
☒ Chapter 11. Check all that apply:

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,725,625. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1). Its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000 and it chooses to proceed under **Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12
9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?
☒ No

☐ Yes

District _____ When _____ Case number _____
MM/ DD/ YYYY

District _____ When _____ Case number _____
MM / DD/ YYYY

If more than 2 cases, attach a separate list.

Debtor

Gavilan Resources, LLC

Case number (if known)

Name

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?☐ No☒ Yes

Debtor

See attached Schedule 1

Relationship

See attached Schedule 1

District

Southern District of Texas

When

See attached Schedule 1

List all cases. If more than 1, attach a separate list.

Case number, if known

MM / DD / YYYY

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention? (Check all that apply.)**

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard?

- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐ Other**Where is the property?**

Number

Street

City

State

ZIP Code

Is the property insured?☐ No☐ Yes. Insurance agency

Contact Name

Phone

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☐ Funds will be available for distribution to unsecured creditors.
- ☒ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors (on a consolidated basis with all affiliated debtors)☒ 1-49☐ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5,001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000

Debtor

Gavilan Resources, LLC

Case number (if known)

Name

15. Estimated assets (on a consolidated basis with all affiliated debtors)	<input type="checkbox"/> \$0-\$50,000	<input type="checkbox"/> \$1,000,001-\$10 million	<input type="checkbox"/> \$500,000,001-\$1 billion
	<input type="checkbox"/> \$50,001-\$100,000	<input type="checkbox"/> \$10,000,001-\$50 million	<input checked="" type="checkbox"/> \$1,000,000,001-\$10 billion
	<input type="checkbox"/> \$100,001-\$500,000	<input type="checkbox"/> \$50,000,001-\$100 million	<input type="checkbox"/> \$10,000,000,001-\$50 billion
	<input type="checkbox"/> \$500,001-\$1 million	<input type="checkbox"/> \$100,000,001-\$500 million	<input type="checkbox"/> More than \$50 billion
16. Estimated liabilities (on a consolidated basis with all affiliated debtors)	<input type="checkbox"/> \$0-\$50,000	<input type="checkbox"/> \$1,000,001-\$10 million	<input checked="" type="checkbox"/> \$500,000,001-\$1 billion
	<input type="checkbox"/> \$50,001-\$100,000	<input type="checkbox"/> \$10,000,001-\$50 million	<input type="checkbox"/> \$1,000,000,001-\$10 billion
	<input type="checkbox"/> \$100,001-\$500,000	<input type="checkbox"/> \$50,000,001-\$100 million	<input type="checkbox"/> \$10,000,000,001-\$50 billion
	<input type="checkbox"/> \$500,001-\$1 million	<input type="checkbox"/> \$100,000,001-\$500 million	<input type="checkbox"/> More than \$50 billion

Request for Relief, Declaration, and Signatures

WARNING – Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

- The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.
- I have been authorized to file this petition on behalf of the debtor.
- I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/15/2020
MM / DD / YYYY

✕

/s/ David E. Roberts, Jr.

Signature of authorized representative of debtor

David E. Roberts, Jr.

Printed name

Chief Executive Officer

Title

18. Signature of attorney

✕

/s/ Alfredo R. Pérez

Signature of attorney for debtor

Date 05/15/2020

MM / DD / YYYY

Alfredo R. Pérez

Printed Name

Weil, Gotshal & Manges LLP

Firm Name

700 Louisiana, Suite 1700

Address

Houston, TX 77002-2784

City/State/Zip

(713) 546-5000

Contact Phone

alfredo.perez@weil.com

Email Address

15776275

Bar Number

Texas

State

Schedule 1**Pending Bankruptcy Cases Filed by the Debtors**

On May 15, 2020, each of the affiliated entities listed below (collectively, the “**Debtors**”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas. The Debtors have filed a motion requesting that the chapter 11 cases of the Debtors be consolidated for procedural purposes only and jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

Company
Gavilan Resources, LLC
Gavilan Resources HoldCo, LLC
Gavilan Resources Holdings, LLC
Gavilan Resources Management Services, LLC

**RESOLUTIONS OF
THE GOVERNING BODIES OF
GAVILAN RESOURCES HOLDINGS, LLC
GAVILAN RESOURCES HOLDCO, LLC
GAVILAN RESOURCES MANAGEMENT SERVICES, LLC
GAVILAN RESOURCES, LLC**

May 15, 2020

The required members of the board of managers, or the sole member, as the case may be (as applicable, the “**Governing Body**”), of each of the above referenced companies (each, a “**Company**,” and collectively, the “**Companies**”), do hereby consent to, adopt, and approve, by written consent in accordance with applicable law, the following resolutions and every action effected thereby:

WHEREAS, the Governing Body of each Company has reviewed and had the opportunity to ask questions about the materials presented by the management and the legal and financial advisors of such Company regarding the liabilities and liquidity of such Company, the strategic alternatives available to it and the impact of the foregoing on such Company’s businesses; and

WHEREAS, the Governing Body of each Company has had the opportunity to consult with the management and the legal and financial advisors of such Company to fully consider each of the strategic alternatives available to such Company; and

WHEREAS, each Governing Body believes that commencing a Chapter 11 Case (as defined below) and taking the actions set forth below are in the best interests of the applicable Company and, therefore, desires to approve the following resolutions; and

WHEREAS, in connection with a Chapter 11 Case (as defined below), each Governing Body has considered providing adequate protection, including paying certain fees, to certain of their prepetition secured lenders pursuant to a consensual cash collateral order (the “**Cash Collateral Order**”) on terms and conditions similar to those previously provided to each Governing Body; and

WHEREAS, each Governing Body, having considered the terms of the Cash Collateral Order, and having consulted with and considered advice from the Company’s legal and financial advisors, deems it advisable and in the best interests of the Company to enter into the transactions contemplated therein.

Commencement of the Chapter 11 Case

NOW, THEREFORE, BE IT RESOLVED, that each Governing Body of each Company has determined, after due consultation with the management and the legal and financial advisors of the applicable Company, that it is desirable and in the best interests of each such Company, its creditors, and other parties in interest that a petition be filed by each such Company seeking relief under the provisions of chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”); and be it further

RESOLVED, that any manager or officer of such Company (each, an “**Authorized Officer**”), in each case, acting singly or jointly, be, and each hereby is, authorized, empowered, and directed to execute and file in the name and on behalf of such Company, and under its corporate seal or otherwise, all petitions, schedules, motions, lists, applications, pleadings, and other documents in the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”), and, in connection therewith, to employ and retain all assistance by legal counsel, accountants, financial advisors, investment bankers and other professionals, and to take and perform any and all further acts and deeds which such

Authorized Officer deems necessary, proper, or desirable in connection with such Company's chapter 11 case (each, a "**Chapter 11 Case**" and together, the "**Chapter 11 Cases**"), including, without limitation, negotiating, executing, delivering, and performing any and all documents, agreements, certificates, and/or instruments in connection with the professional retentions set forth in this resolution, with a view to the successful prosecution of such Chapter 11 Case; and be it further

Retention of Advisors

RESOLVED, that the law firm of Weil, Gotshal & Manges LLP, located at 767 Fifth Avenue, New York, New York 10153, is hereby retained as attorneys for the Company in the Chapter 11 Case, subject to Bankruptcy Court approval; and be it further

RESOLVED, that the firm of Vinson & Elkins, LLP, located at 2001 Ross Avenue, Suite 3900, Dallas, Texas 75201, is hereby retained as attorneys for the Company in the Chapter 11 Case, subject to Bankruptcy Court approval; and be it further

RESOLVED, that the firm of Lazard Frères & Co. LLC, located at 30 Rockefeller Plaza, New York, New York 10112, is hereby retained as investment banker for the Company in the Chapter 11 Case, subject to Bankruptcy Court approval; and be it further

RESOLVED, that the firm of Huron Consulting Services LLC, located at 1166 Avenue of the Americas, Suite 300, New York, New York 10036, is hereby retained as restructuring advisors for the Company in the Chapter 11 Case, subject to Bankruptcy Court approval; and be it further

RESOLVED, that the firm of Epiq Corporate Restructuring, LLC, located at 777 Third Avenue, 12th Floor, New York, New York 10017, is hereby retained as claims and noticing agent for the Company in the Chapter 11 Case, subject to Bankruptcy Court approval; and be it further

Use of Cash Collateral

RESOLVED, each Governing Body of each Company authorizes and directs the Authorized Officers to take such action as such officers deem necessary or appropriate to cause each Company, respectively, to complete the transactions contemplated by the Cash Collateral Order, and any and all other agreements, documents, or instruments required or appropriate in connection with or incidental to the transactions contemplated by each of the foregoing; and be it further

Ratification

RESOLVED, that any Authorized Officer, who may act without the joinder of any other Authorized Officer, is hereby authorized, empowered, and directed, in the name and on behalf of each applicable Company, to cause such Company to enter into, execute, deliver, certify, file and/or record, and perform, such agreements, instruments, motions, affidavits, applications for approvals or rulings of governmental or regulatory authorities, certificates, or other documents, and to take such other actions that in the judgment of any Authorized Officer, who may act without the joinder of any other Authorized Officer, shall be or become necessary, proper, or desirable in connection with these Resolutions and Chapter 11 Cases; and be it further

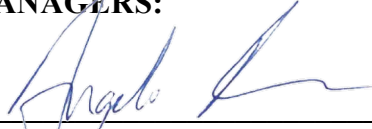
RESOLVED, that any and all past actions heretofore taken by any Authorized Officer in the name and on behalf of the applicable Company in furtherance of any or all of the preceding resolutions be, and the same hereby are, ratified, confirmed, and approved in all respects as the acts and deeds of such Company; and be it further

RESOLVED, that a copy of this Resolution executed as aforesaid may be placed in the minute book of each Company and such copy shall be conclusive evidence that these resolutions have been adopted.

[Signature Pages Follow]

IN WITNESS WHEREOF, the undersigned, being all of the managers of the Board of Managers of GAVILAN RESOURCES HOLDINGS, LLC, have executed this written consent as of the date set forth above.

MANAGERS:

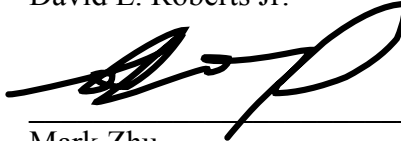


Angelo Acconcia



Jun (John) Hyung Lee

David E. Roberts Jr.



Mark Zhu

Al Hirshberg

John Schopp

Neal Goldman

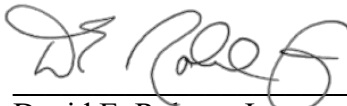
DJ (Jan) Baker

IN WITNESS WHEREOF, the undersigned, being all of the managers of the Board of Managers of GAVILAN RESOURCES HOLDINGS, LLC, have executed this written consent as of the date set forth above.

MANAGERS:

Angelo Acconcia

Jun (John) Hyung Lee



David E. Roberts Jr.

Mark Zhu

Al Hirshberg

John Schopp

Neal Goldman

DJ (Jan) Baker

IN WITNESS WHEREOF, the undersigned, being all of the managers of the Board of Managers of GAVILAN RESOURCES HOLDINGS, LLC, have executed this written consent as of the date set forth above.

MANAGERS:

Angelo Acconcia

Jun (John) Hyung Lee

David E. Roberts Jr.

Mark Zhu



Al Hershberg

John Schopp

Neal Goldman

DJ (Jan) Baker

[Signature Page to Written Consent]

IN WITNESS WHEREOF, the undersigned, being all of the managers of the Board of Managers of GAVILAN RESOURCES HOLDINGS, LLC, have executed this written consent as of the date set forth above.

MANAGERS:

Angelo Acconcia

Jun (John) Hyung Lee

David E. Roberts Jr.

Mark Zhu

Al Hirshberg

John Schopp

Neal Goldman

DJ (Jan) Baker

[Signature Page to Written Consent]

IN WITNESS WHEREOF, the undersigned, being all of the managers of the Board of Managers of GAVILAN RESOURCES HOLDINGS, LLC, have executed this written consent as of the date set forth above.

MANAGERS:

Angelo Acconcia

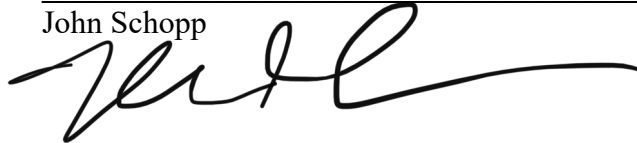
Jun (John) Hyung Lee

David E. Roberts Jr.

Mark Zhu

Al Hirshberg

John Schopp

A handwritten signature in black ink, appearing to read 'Neal Goldman', written over a horizontal line.

Neal Goldman

DJ (Jan) Baker

IN WITNESS WHEREOF, the undersigned, being all of the managers of the Board of Managers of GAVILAN RESOURCES HOLDINGS, LLC, have executed this written consent as of the date set forth above.

MANAGERS:

Angelo Acconcia

Jun (John) Hyung Lee


David E. Roberts Jr.

Mark Zhu

Al Hirshberg

John Schopp

Neal Goldman

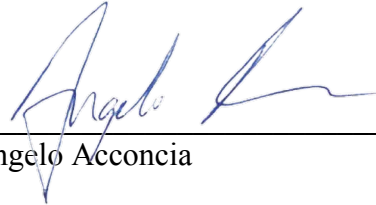


DJ (Jan) Baker

[Signature Page to Written Consent]

IN WITNESS WHEREOF, the undersigned, being all of the managers of the Board of Managers of GAVILAN RESOURCES HOLDCO, LLC, have executed this written consent as of the date set forth above.

MANAGERS:



Angelo Acconcia



Jun (John) Hyung Lee



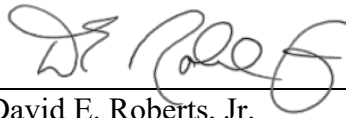
Mark Zhu

[Signature Page to Written Consent]

IN WITNESS WHEREOF, the undersigned, being the sole member of GAVILAN RESOURCES MANAGEMENT SERVICES, LLC, has executed this written consent as of the date set forth above.

SOLE MEMBER:

Gavilan Resources Holdings, LLC

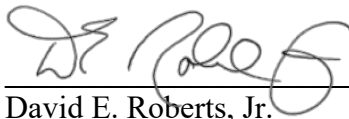
A handwritten signature in black ink, appearing to read "D. Roberts", is written over a horizontal line.

David E. Roberts, Jr.
Chief Executive Officer

IN WITNESS WHEREOF, the undersigned, being the sole member of GAVILAN RESOURCES, LLC, has executed this written consent as of the date set forth above.

SOLE MEMBER:

Gavilan Resources HoldCo, LLC

A handwritten signature in black ink, appearing to read "D. Roberts", is written over a horizontal line.

David E. Roberts, Jr.
Chief Executive Officer

Fill in this information to Identify the case:

Debtor Name: GAVILAN RESOURCES, LLC

United States Bankruptcy Court for the: SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION

Case Number (If known):

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1 SN EF MAVERICK LLC 1000 MAIN ST STE 3000 HOUSTON, TX 77002	CONTACT: CAMERON W. GEORGE, CFO PHONE: (713) 783-8000 MCAVENAUGH@JW.COM	TRADE DEBT	C, U, D			\$10,026,014.34
2 WGR OPERATING LP 1201 LAKE ROBBINS DR THE WOODLANDS, TX 77380	CONTACT: MICHAEL P. URE, CEO PHONE: (832) 636-6000 FAX: (832) 636-0547 MICHAEL_URE@OXY.COM	TRADE DEBT				\$4,932,907.69
3 VENADO EF LP 13301 GALLERIA CIRCLE 300 AUSTIN, TX 78738	CONTACT: SCOTT GARRICK, CEO PHONE: (512) 518-2900 FAX: (512)-518-2910 OWNER.RELATIONS@VOGLLC.COM	TRADE DEBT				\$81,314.92
4 MITSUI E&P TEXAS LP 1300 POST OAK BLVD SUITE 1800 HOUSTON, TX 77056	CONTACT: KAZUHIKO GOMI PHONE: (713) 960-0023 K.GOMI@MITSUI.COM	TRADE DEBT				\$43,246.14
5 CORE GEOLOGIC LLC 1600 BROADWAY SUITE 1480 DENVER, CO 80202	CONTACT: DANIEL LOWRIE, VICE PRESIDENT PHONE: (832) 776-3768 DLOWEIE@CORELOGIC.COM	TRADE DEBT				\$34,950.00
6 DRILLING INFO INC 3333 LEE PARKWAY DALLAS, TX 75219	CONTACT: ALLEN GILMER INFO@DRILLINGINFO.COM	TRADE DEBT				\$15,990.00
7 ENVIRONMENTAL SYSTEMS RESEARCH INSTITUTE INC 380 NEW YORK STREET REDLANDS, CA 92373	CONTACT: JACK DANGERMOND FAX: (909)-793-5953	TRADE DEBT				\$4,871.25

Debtor: GAVILAN RESOURCES, LLC

Case Number (if known): 20-xxx1

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
8	SILVERSAND SERVICES INC 2827 BARKER CYPRESS RD HOUSTON, TX 77084	CONTACT: MARK LLOYD PHONE: 713-722-0336 FAX: (713)-722-8160 MLLOYD@SILVERSANDSERVICES.COM	TRADE DEBT				\$104.49
9	NYSE MARKET (DE), INC. 11 WALL ST. FL 6 NEW YORK, NY 10005-1905	CONTACT: ASHA SHAH, DIRECTOR PHONE: 212-656-3000 ASHA.SHAH@THEICE	TRADE DEBT				\$72.49

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: GAVILAN RESOURCES, LLC, Debtors.¹	§ § § § § § § § §	Chapter 11 Case No. 20-_____ (____) (Joint Administration Requested)
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**CORPORATE OWNERSHIP STATEMENT PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 7007.1**

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1, attached hereto as **Exhibit A**, is an organizational chart for Gavilan Resources, LLC and its affiliated debtors as proposed debtors and debtors in possession (collectively, the “**Debtors**”). The Debtors respectfully represents as follows:

1. Gavilan Resources Holdings, LLC (“**Holdings**”) is the ultimate parent entity of each of the other Debtors.
2. Holdings holds 100% of the Common Units of Gavilan Resources HoldCo, LLC. Non-Debtor SN Comanche Manager, LLC holds 100% of the Class A Units of Gavilan Resources HoldCo, LLC.
3. Holdings holds 100% of the equity interests of Gavilan Resources Management Services, LLC.

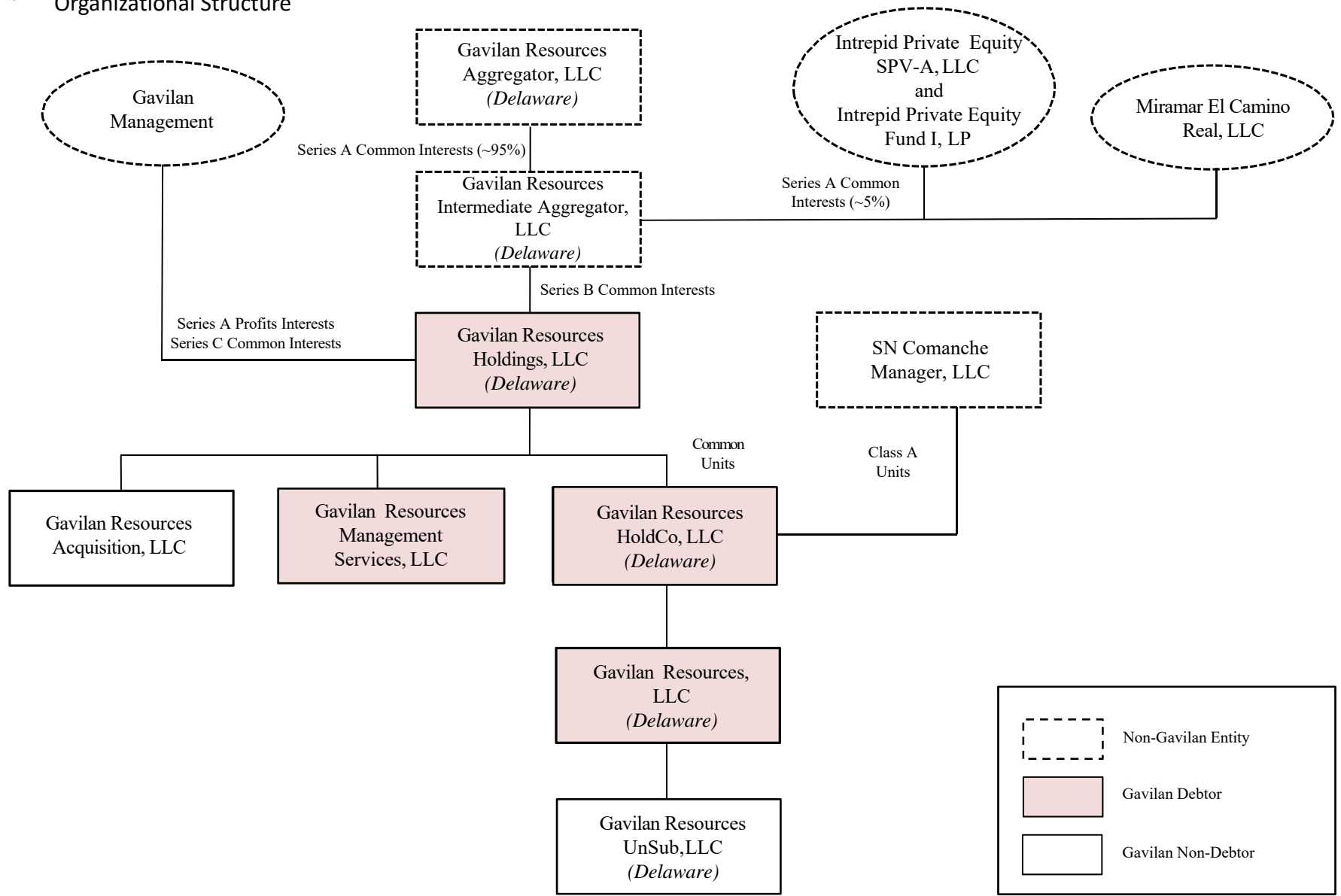
¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Gavilan Resources, LLC (6688); Gavilan Resources HoldCo, LLC (6425); Gavilan Resources Holdings, LLC (4496); and Gavilan Resources Management Services, LLC (3961). The Debtors’ mailing address is 920 Memorial City Way, Suite 1400, Houston, Texas 77024.

4. Gavilan Resources HoldCo, LLC holds 100% of the equity interests of Gavilan Resources, LLC.

5. Non-Debtor Gavilan Resources Intermediate Aggregator, LLC holds 100% of Series B Common Interests in Holdings. Certain current employees of the Debtors hold 100% of the Series A Profit Interests and the Series C Common Interests of Holdings.

Exhibit A

Organizational Chart



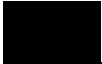
Fill in this information to identify the case and this filing:Debtor name: Gavilan Resources, LLCUnited States Bankruptcy Court for the: Southern District of Texas
(State)

Case number (If known): _____

Official Form 202**Declaration Under Penalty of Perjury for Non-Individual Debtors****12/15**

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING – Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

 Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule* _____
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 30 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☒ *Other document that requires a declaration* Corporate Ownership Statement

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/15/2020
MM / DD / YYYY

✕

/s/ David E. Roberts, Jr.

Signature of individual signing on behalf of debtor

David E. Roberts, Jr.

Printed name

Chief Executive Officer

Position or relationship to debtor